



**VIA ECF**

December 13, 2024

The Honorable John P. Cronan  
United States District Court  
500 Pearl Street, Room 1302  
New York, New York 10007

Re: *Lozada v. TaskUs, Inc.*, Case No. 1:22-cv-01479 (S.D.N.Y.)

Dear Judge Cronan:

Pursuant to Paragraph 14 of the Stipulated Confidentiality Agreement and Protective Order (ECF 63), Section 4.B of Your Honor's Individual Rules and Practices in Civil Cases, the Court's Standing Order, 19-mc-583, and the Court's ECF Rules & Instructions, Section 6, I write on behalf of Plaintiffs Humberto Lozada and Oklahoma Firefighters Pension and Retirement System (together, "Plaintiffs"), to respectfully request permission of the Court to file the unredacted version of Plaintiffs' Supplemental Memorandum of Law in Further Support of Motion for Class Certification and Appointment of Class Representatives and Class Counsel (the "Supplemental Memorandum") and its Exhibits 5-7 and 9 under seal.

The Supplemental Memorandum and Exhibits 5-7 and 9 include information that Defendants have designated as Confidential Discovery Material under the Stipulated Confidentiality Agreement and Protective Order (ECF 63). The parties have conferred and agree that these materials may be sealed. Defendants have not withdrawn any of their confidentiality designations. Plaintiffs do not oppose these designations for purposes of this Motion.

Plaintiffs are concurrently filing the Supplemental Memorandum in redacted form, and Exhibits 5-7 and 9 under seal, pending the Court's ruling on this motion to seal.

Respectfully submitted,

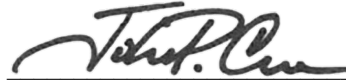
/s/ Joseph A. Fonti  
Joseph A. Fonti

cc: Counsel of Record (via ECF)

The request to keep filed under seal the unredacted version of Plaintiffs' Supplemental Memorandum and its Exhibits 5 to 7 and 9 is granted. The Court finds that Defendants' interest in maintaining the confidentiality of the redacted portions of the Supplemental Memorandum and of Exhibits 5 to 7 and 9, which include confidential information about TaskUs's response to the Spruce Report and the company's securities trading policy, outweighs the presumption of full public access to the judicial documents in which that information is contained. *See Lugosch v. Pyramid Co. of Onondaga*, 435 F.3d 110 (2d Cir. 2006). The Clerk of Court is respectfully directed to maintain under seal the unredacted version of Plaintiffs' Supplemental Memorandum and its Exhibits 5 to 7 and 9, *see* Dkts. 171, 172. The Clerk of Court is also respectfully directed to close Docket Number 168.

SO ORDERED.

Date: March 26, 2025  
New York, New York

A handwritten signature in black ink, appearing to read "John P. Cronan", written over a horizontal line.

JOHN P. CRONAN  
United States District Judge